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EDWARD BENNETT WILLIAMS (1920-1988)
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May 29, 2020

Via ECF

Hon. Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Türkiye Halk Bankası A.Ş.*, S6 15 Cr. 867 (RMB)

At the arraignment on March 31, the Court requested that we advise the Court after approximately 60 days whether we had been able to meet with our client in person. Due to the ongoing COVID-19 crisis, we have not been able to meet with our client.

As of today, non-Turkish citizens are still prohibited from entering Turkey, and all international flights on Turkish Airlines are cancelled. We are hopeful that this will change in the next 45 days. Accordingly, Halkbank respectfully requests that the status conference currently set for June 9 be adjourned for 45 days. Of course, Halkbank waives all speedy trial rights during the requested adjournment.

I have conferred with counsel for the government, who object to this request.

Respectfully,

/s/
Robert M. Cary

cc: Counsel of record